

Central Lincolnshire Joint Strategic Planning Committee Hearing Statement

November 2022

[MATTER 1: Legal Compliance](#)



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Issue 1 – Duty to Cooperate

Q1 – The Statement of Common Ground (updated September 2022) states that an additional document is in preparation with Bassetlaw District Council regarding the Apleyhead logistics site. What is the latest position regarding the completion of this Statement? How does it demonstrate constructive, active and ongoing engagement on a strategic cross-boundary issue?

The Statement of Common Ground between Bassetlaw District Council and the Central Lincolnshire Joint Strategic Planning Committee was signed in July 2022. A copy is available on the Bassetlaw District Council website <https://www.bassetlaw.gov.uk/media/7034/scg-017-socg-central-lincs-and-bassetlaw.pdf>. It sets out the strategic cross boundary matters discussed, evidence data shared, and agreements reached at the time. It also sets out the commitment to continue to share evidence and information, including updates to both Infrastructure Delivery Plans and sharing information and continuing to work together on traffic impact and mitigation.

If the Inspectors so wish, the SoCG can be added to the Central Lincolnshire Local Plan examination library as well.

Q2 – The Statement of Common Ground confirms that discussions have taken place with the Lincolnshire Clinical Commissioning Group ('CCG') on behalf of the NHS. However, what evidence can the Committee point to which demonstrates that this engagement was constructive? For example, did it lead to any specific policy outcomes?

The engagement with the Lincolnshire CCG on behalf of the NHS included discussions around the role of health care needs and opportunities as part of District, Local and City Centres, the integration of community assets and their role in the high street. As a result of these discussions, specific reference to health and health facilities have been suggested as modifications to Policies S36 and S40 and the supporting text for Policy S36 to further emphasise their important role in such centres. (EX011)

Q3 – How did the Committee consider potential strategic cross-boundary issues with North Lincolnshire Council, having particular regard to the impacts of growth along the A15?

As is detailed in the Statement of Common Ground (STA007.2), North Lincolnshire Council is a neighbouring authority and a Duty to Cooperate Body. Throughout the development of the Central Lincolnshire Local Plan, and in support of the work on the North Lincolnshire Local Plan there has been regular dialogue, which will not end with either Local Plan being submitted. Specifically, the Statement of Common Ground identifies North Lincolnshire Council as a signatory against a number of Strategic Planning Matters in Appendix 1, including Matter 9 – Meeting Transport Infrastructure Needs (see page 33). Through this process, North Lincolnshire Council has signed up to ongoing cooperation to address emerging transport matters, such as the A15. The Central Lincolnshire authorities and Lincolnshire County Council (as Highways Authority for Central Lincolnshire) has also signed up to this ongoing joint-working.

It should be noted that, with the exception of two comments at Regulation 19 consultation from North Lincolnshire Council (rep IDs 1102325 and 1102326) no other concerns have been raised throughout the local plan process specifically relating to the impact of growth in the Central Lincolnshire Local Plan on the performance of the A15. It should also be noted that these representations do not amount to objections to the plan or the evidence behind it but suggesting that reference is made to the issues on the A15.

The A15 is one of a number of strategic routes in the area and one where the impacts from growth proposed in the Local Plan has been tested through the Upper Tier Transport Modelling (**TRA007** which supported the adopted Local Plan and verified as still being fit for purpose in **TRA006**). The Upper Tier Transport Modelling did not identify any major capacity or other performance issues on the A15 to the north of Lincoln resulting from growth in the Local Plan.

However, it is recognised that there are more general performance issues on the A15 to the north of Lincoln and into North Lincolnshire. This is being considered through joint working between North Lincolnshire Council, West Lindsey District Council, Lincolnshire County Council, and the Greater Lincolnshire Local Enterprise Partnership. In spring 2022, a joint feasibility study was commissioned by the partners on the A15 corridor with anticipated completion of this study being February 2023. As such, this work is at a very early stage and so any improvements likely to be needed to the A15 corridor are not known at this time. This work will help to inform any improvements potentially needed to the A15 corridor in future versions of the plan and it will also inform masterplanning work on the RAF Scampton Opportunity Area should the development on this site be of a scale that will impact on the A15.

Q4 – Has the Duty to Cooperate under sections 20(5)(c) and 33A of the 2004 Act and Regulation 4 of the 2012 Regulations been complied with, having regard to advice contained in the National Planning Policy Framework (the ‘Framework’) and the National Planning Practice Guidance (the ‘PPG’)?

Yes. The Statement of Compliance with the Duty to Cooperate (**STA018**) demonstrates how the duty to cooperate has been complied with. This includes providing details of the statutory and duty to cooperate bodies that have been engaged throughout the process, details of the strategic and cross boundary issues that exist and outcomes of these matters through the plan-making process, and the broad process of engagement that has been followed. Further detail is then set out in the Statement of Common Ground (**STA007.2**) which identifies the level of agreement reached on the strategic matters.

Issue 2 – Public Consultation

Q1 – Has public consultation been carried out in accordance with the Central Lincolnshire Statement of Community Involvement (‘SCI’), the Framework, the PPG and the requirements of the 2004 Act and 2012 Regulations?

Yes, the Regulation 19 Statement of Consultation (**STA019**) and Regulation 22 Statement of Consultation (**STA021**) set out how each stage of public consultation was undertaken in accordance with the above documents.

Q2 – Were adequate opportunities made available for participants to access and make comments on the Local Plan, and other relevant documents, in different locations and in different formats (such as in paper and online)?

Yes, electronic copies of the Local Plan and key supporting documents were available to view via the consultation portal and on the Central Lincolnshire website, alongside the other documents that make up the Planning Policy Library.

Paper copies of the Local Plan and SA were made available at the offices of City of Lincoln Council, North Kesteven District Council and West Lindsey District Council and Lincolnshire

County Council as well as the following libraries: Lincoln Central; Market Rasen; Gainsborough and Sleaford.

This provision is in accordance with the adopted Statement of Community Involvement (**STA003**).

Q3 - Was a consistent approach taken to public consultation across the three Council areas?

Yes, each of the formal public consultations were set up and managed by the Committee for the whole Central Lincolnshire area.

Of course, other organisations and bodies (such as the County, Districts and Parish Councils, and other organisations, lobby groups or networking organisations) may well have undertaken their own informal publicity and awareness raising of the Plan. Such additional awareness raising is supported, in principle, by the Committee, but it is not something the Committee could control. Therefore, this could have led to different areas having even greater awareness of the consultation stages than other areas.

Q4 - How did the Committee reach different groups within the community to inform people about the Local Plan, such as the elderly or residents in smaller, rural villages?

In accordance with the Regulations, and as local representatives, Parish Councils have been consulted at each stage of consultation. At the second Regulation 18 consultation, on the Consultation Draft Local Plan, Parish Councils were given a 2 week advance notice of the consultation commencing, with early sight of the document. This advance notice was provided to enable the Parish Council to be able to discuss the Consultation Draft Local Plan within their Parish and within their meeting cycle and provide a response prior to the close of the consultation.

Furthermore, press releases were issued at each formal stage of consultation and this was picked up in local media.

The Regulation 19 Statement of Consultation (**STA 019**) sets out at Appendix 1 and Appendix 2 the bodies invited to make representations at the two Regulation 18 consultations. These bodies include religious groups, residents' associations, community groups and community centres and village halls.

Issue 3 – Sustainability Appraisal

Q1 – The Interim Sustainability Appraisal for the Central Lincolnshire Local Plan (June 2021) (Appendix 2) assessed three options for housing growth. How were the options defined and what were they based on?

The Interim Sustainability Appraisal (SA) Report (**STA004b, STA004d**), which accompanied the Regulation 18 Draft Local Plan, assessed the following different options for the overall level of housing growth:

- *Option 1: A housing range of between the latest local housing need figure (currently 1,086 dwellings) and 1,325 dwellings per year and delivery of approximately 24,000 jobs as defined by local evidence;*
- *Option 2: A fixed housing figure at the Local Housing Need Figure (currently 1,086 dwellings) and no locally set number of jobs to be delivered;*

- *Option 3: A fixed housing figure of 1,325 dwellings and delivery of approximately 24,000 jobs as defined by evidence*

The Final SA Report (**STA004.1b**, **STA004.1g**), which accompanies the Submitted Local Plan, presented an assessment of a further option following consultation at Regulation 18:

- *Option 4: A higher fixed housing figure sufficient to deliver 592 affordable dwellings per year to meet the identified needs (in the region of 2,960 dwellings per year).*

The background to the development of these options is set out in the Growth Options Paper, March 2022 (**STA011.1**) and the Policy Evidence Report for Policy S2 Growth Levels and Distribution (**EVR002**). Spatial Issue 1 in the Growth Options Paper discusses the possible options for housing need and provides a qualitative assessment of these options. These four options were chosen as they all had a clear, evidence-based and justified starting point based on the standard method, the evidence in the Housing Needs Assessment (**HOU001**) and the Economic Needs Assessment (**ECO001**), and based on meeting affordable housing need.

There was no evidential basis available to assess further reasonable options beyond these, and it would be unreasonable and unproportionate to assess multiple additional figures without a sound basis.

Q2 – Appendix 2 (Interim SA, June 2021) concludes that the outcomes between Options 1 and 3 are very similar. What were the reasons, therefore, for pursuing the preferred outcome (Option 1)?

The Sustainability Appraisal (SA) score for Option 1 and 3 are very similar as, within the plan, the outcomes would be almost identical, from a sustainability appraisal basis. Under both options the plan would seek to allocate sites to deliver the same number of homes across Central Lincolnshire.

The justification for selecting Option 1 is referenced in the conclusion to the assessment in the Interim SA on pages 22 to 23 (**STA004d**) and is also set out in paragraphs 2.1 to 2.7 of the Central Lincolnshire Growth Options Paper (**STA011.1**). As is clarified in the Growth Options Paper, the only difference between the two options is that five year land supply calculations will be based against the standard method for Local Housing Need, which is clearly stated as being the minimum housing requirement for areas.

Whilst the Committee and the Central Lincolnshire districts wish to promote growth, the application of the range is intended to protect the area from any national or global issues that might affect supply and that would be out of the control of the Committee, and therefore result in speculative, unplanned applications being submitted for development in unsustainable locations or contrary to the strategy of the plan. The Committee feels that it would be inappropriate to penalise the area for actively seeking to boost housing provision by requiring five year land supply calculations to be calculated above the minimum.

Q3 – The June 2021 SA also assessed different options for the distribution of new development. Option 4 included the provision of one or more new settlements. Was this based on proposed schemes, known to the Committee at that time, or generic proposals for new settlements?

The Issues and Options consultation (**STA014a**) sought respondents' views on proposals relating to the distribution of growth. The creation of one or more new settlements was suggested as an

alternative to focusing growth on Gainsborough and Sleaford (page 38, **STA014b**). The Committee felt that this was a reasonable option, as a matter of principle, to consider further.

The evidence behind the consideration of options for the strategic distribution of growth across Central Lincolnshire is contained within the Growth Options Paper (**STA011.1**). See paragraphs 4.23 to 4.30 for the background behind Option 4.

Paragraph 4.25 confirms that Option 4 was not based on specific land or proposals submitted to the Committee but on the principle of delivering growth through one or more new settlements:

“Clearly there could feasibly be any number of locations where new freestanding settlements could be located, dependent on the constraints, opportunities, market appetite and land availability. At this stage we are not considering the precise location, but the principle of meeting growth needs through such a new settlement.”

The SA of Option 4 was undertaken based on the assumptions set out in paragraphs 4.23 to 4.30 of the Growth Options Paper.

Q4 – Did the SA consider different options for the scale and distribution of employment growth proposed in the Plan?

Yes it did.

The Interim Sustainability Appraisal (**STA004d**) considered the different options for the distribution of employment growth at the Regulation 18 stage under Policy S27 Spatial Strategy for Employment (Policy S28 in the submitted Local Plan).

Three reasonable options were considered, with the preferred option being Option 1:

- *Option 1: A spatial strategy for employment aligned to the overall spatial strategy and distribution of growth for Central Lincolnshire;*
- *Option 2: A spatial strategy that is different to the overall spatial strategy and distribution of growth more evenly across smaller settlements; and*
- *Option 3: No local based strategic policy and rely on national policy*

At the Regulation 19 stage, no further options were identified from emerging evidence or responses to the Regulation 18 consultation, and therefore the options for the spatial strategy for employment remained the same and were appraised in the Final SA Report (**STA004.1g**).

The Interim Sustainability Appraisal also considered options for the scale of employment growth under Policy S28 Strategic Employment Sites (S29 in the submitted Local Plan).

Three reasonable options were considered, with the preferred option being Option 1:

- *Option 1: Retain the allocated strategic employment sites in the adopted Central Lincolnshire Local Plan 2017*
- *Option 2: Allocate further strategic employment sites above those already allocated*
- *Option 3: No local policy allocating Strategic Employment Sites - rely on a criteria-based windfall employment policy, national policy and other Local Plan policies*

At the Regulation 19 stage, no further options were identified from emerging evidence or responses to the Regulation 18 consultation and therefore the options for the scale of employment growth remained the same and were appraised in the Final SA Report (**STA004.1g**).

Appendix 4 (**STA004.1g**) of the Final SA Report sets out the detailed appraisal of the options for the scale and distribution of employment growth. Appendix 7.1 (**STA004.1j**) of the Final SA Report provides a brief summary of the justification for selecting the preferred policy approach throughout the preparation of the Local Plan. The evidence report for Policies S28-S34 Employment Policies (**ENV028-034**) provides more detailed background information and justification, including the reasonable alternatives considered and the rationale for the selection of the preferred policy option.

Q5 – How was the list of ‘reasonable alternative’ sites defined for the purposes of the SA?

The SA considered and tested all *reasonable* alternatives to the allocation of sites in accordance with regulation 12(2) of the SEA Regulations¹. Although the regulations require reasonable alternatives to be assessed, they are not prescriptive as to what constitutes a reasonable alternative and there is no requirement to consider every conceivable option. There is therefore a judgement to be made by the plan-maker as to which alternatives should be included in the SA.

The National Planning Practice Guidance (PPG)² provides some guidance with the following definition of reasonable alternatives:

“Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable”.

Section 4.2 of the Final SA Report (**STA004.1b**) sets out how reasonable alternatives were identified for the submitted plan. Paragraphs 4.2.25 to 4.2.30 explain how sites were identified for housing and paragraphs 4.2.31 to 4.2.32 explain the process for Gypsy and Travellers and Travelling Showpeople sites. Reasonable alternatives were not defined for employment site allocations (please see our response to Matter 11, Issue 2, Q1).

Paragraphs 4.2.25 to 4.2.30 of the Final SA Report provide an overview of the process for identifying and selecting housing sites, signposting the reader to supporting evidence which sets out the process in greater detail. For housing sites, the primary evidence explaining the selection process is contained within the Policies S76-S83: Sustainable Urban Extensions and Housing Allocations in Lincoln Urban Area, Main Towns, Market Towns, and Large, Medium and Small Villages Evidence Report, March 2022 and Appendices (**HOU002a**, **HOU002b**, **HOU002c**, **HOU002d**, **HOU002e** and **HOU002f**).

In summary, the Committee applied a 2-stage process to reach a list of ‘reasonable alternative’ sites for housing.

Stage 1 involved a desktop review of existing information held within the Housing and Economic Land Availability Assessment (HELAA) (**HOU003 and A, B and C**), including consulting land owners and promoters to identify which sites were known to be available still. This resulted in 440 sites being carried forward in the HELAA May 2019.

A call for sites was carried out in June 2019 as part of the wider Local Plan consultation to enable new sites to be put forward by landowners, developers, agents and members of the public. This consultation, taken together with existing sites and land owned by Local Authorities, resulted in a ‘long list’ of more than 800 potential housing sites of various sizes and locations.

¹ Regulation 12 (2) Environmental Assessment of Plans and Programmes Regulations 2004 (S.I. 2004/1633) available online at: www.legislation.gov.uk/uksi/2004/1633/contents/made

² PPG Paragraph: 018 Reference ID: 11-018-20140306

Stage 2 then filtered the long list of sites to reach a list of reasonable sites that could be put forward for assessment in the SA. The Committee applied the following criteria to filter these sites:

- National policy: Those sites which would clearly be in conflict with national planning policy – such as being wholly within flood zone 3, or being within a Scheduled Monument as is set out in paragraph 3.7 of the Housing Allocations Evidence Report;
- Threshold: Sites with capacity for less than 10 dwellings when considered on the density assumptions set out in paragraphs 4.7 to 4.16;
- Location: Those sites disconnected or not well related to existing settlements which would not support the objectives of sustainable development and could have the potential to harm the character of the open countryside. This included sites located in the countryside or within a hamlet as set out in paragraphs 4.1 and 4.2.

Sites that were not filtered out by these criteria were taken forward into the SA as reasonable alternatives. Those sites taken forward with extant planning permission and where construction had started on site, were not subject to SA.

At each stage of the preparation of the plan, all reasonable alternative sites were assessed on an equal basis using the same methodology and level of detail as the preferred site allocations in the plan. Any new sites that emerged during the preparation of the plan, for example, as a result of updated evidence or comments from respondents submitted during a consultation stage, were also subject to full SA, where they met the criteria to be considered a reasonable alternative.

Paragraph 4.2.30 of the Final SA Report demonstrates that the identification of reasonable alternatives was an iterative process throughout the preparation of the submitted plan. Appendix 7 (see document **EX006** for the most recent version) to the Final SA Report was prepared to provide an audit trail of a site's progress through the different stages of plan making.

The detailed matrices setting out the SA of all reasonable alternatives for housing sites can be found in Appendices 5.1, 5.2 and 5.3 (**STA004.hi**, **STA004.hii** and **STA004.hiii**) and for Gypsy and Travellers and Travelling Showpeople sites in Appendix 6 (**STA004.1i**).

For completeness, please also see the Committee's response to Q9 below, in respect of a SA Addendum consultation that took place in August 2022.

Q6 – Where RAF Scampton is concerned, the June 2021 SA considered three options for its redevelopment. Option 2 included the allocation of the site as a mixed-use development. However, neither the proposed uses nor the scale of development was specified in the SA. What were the reasons for this? In the absence of any specific details at the time, how did the SA enable the Committee to reach an informed decision on the growth strategy for the area?

The background and evidence behind the development of Policy S75 RAF Scampton is primarily contained within the policy evidence report (**ENV075**).

Option 2 did not specify proposed uses or scale of development because at the time of formulating the different options for this site, there was significant uncertainty about the future of the site in terms of the date of decommission and how the site will be disposed of and even what area of the site will be available and not subject to an incumbrance. Without evidence and a good understanding of the opportunities and constraints, it was not possible to provide greater detail on acceptable uses. Indeed, this would have been inappropriate and potentially mislead future purchasers of the site on future acceptable uses or unintentionally result in development of the site not making the best use of it.

Therefore, the reasonable alternatives for this policy tested broad policy approaches based on the information available at the time of producing the plan. The Interim SA Report (**STA004d**) appraised three options, with the preferred option being Option 1:

- *Option 1: A policy which provides a positive framework to promote the regeneration of this site as a Regeneration Opportunity Area with specific criteria;*
- *Option 2: Formal allocation of this site with a strict list of policy requirements but no requirement for a comprehensive site masterplan; and*
- *Option 3: No specific policy for RAF Scampton, with development proposals being considered against general policies in the Local Plan.*

At the Regulation 19 stage, no further options were identified from emerging evidence or responses to the Regulation 18 consultation and therefore the options for RAF Scampton remained the same and were appraised in the Final SA Report (**STA004.1g**).

These options only sought to consider the potential implications of the policy approach from a sustainability perspective rather than the specifics on the site.

The SA of the policy approaches to RAF Scampton identified a number of uncertain effects against the SA objectives for Option 2 and 3, with Option 3 potentially resulting in a number of major negative effects. Option 1 was predicted to have a number of positive impacts against the SA objectives, as it was based on policy wording which specifically required any proposals to be accompanied by a site masterplan.

Whilst these options meant that there were uncertain outcomes in some objectives, it allowed the Committee to consider the potential impacts, both positive and negative, of being more prescriptive on what can happen on the site in the plan, or leaving it to be dealt with without a specific policy framework. The preferred option will allow the full assessment of proposals on the site, based on the constraints and opportunities that will impact its sustainability.

Q7 – Are the various iterations of the SA based on robust and up-to-date information relating to the likely significant effects of new development, especially where sites are concerned?

The Committee believes that they are.

The SA Scoping Report (**STA004.1a**) sets out the methodology for undertaking the SA and the scope and level of detail of the information to be included. The PPG states that:

“A key aim of the scoping procedure is to help ensure the sustainability appraisal process is proportionate and relevant to the plan being assessed.” (Paragraph: 014 Reference ID: 11-014-20140306)

The Committee updated the SA Scoping Report at the main stages of plan preparation to ensure that information such as the baseline data and key sustainability issues remained relevant and up to date (see response to Question 8 below for when the SA Scoping Report was updated and published).

Local Plan policies, and reasonable alternatives, were appraised using the SA Framework for policies (Table 4.3, page 25 of **STA004.1b**) using professional judgement to reach a decision on the likely effects with reference to the baseline environmental, economic and social characteristics of the plan area. Appraisals drew on the Local Plan evidence base where relevant, for example, the Housing Needs Assessment and Economic Needs Assessment.

Preferred site allocations, and reasonable alternatives, were appraised using the SA Framework for sites (Appendix 2, **STA004.1eii**) using GIS data and qualitative assessment, such as expert

opinion, to reach a decision on the likely effects. The source of the GIS data used in the appraisal is clearly stated under the 'Approach and Assumptions' column of the Framework. Where expert opinion was used this is also clearly stated. For example, for Objective 6 Built and Historic Environment, the assessment involved consultation with Conservation Officers and Archaeologists to inform decisions around the nature of potential effects as this could not be determined using GIS distance criteria alone.

The SEA Regulations require the SA Report to consider any difficulties (such as technical deficiencies or lack of know-how) encountered during the SA. Data limitations were stated in the SA Report and any assumptions made clearly set out (paragraph 4.35 of **STA004.1b** and the Sites SA Framework **STA004.1eii**).

Some site promoters provided detailed information relating to potential mitigation, such as evidence of survey work and site masterplans. However, this was not available consistently for all sites submitted for consideration in the site selection process. The PPG is clear that alternatives should be evaluated using the evidence base "*employing the same level of detail for each alternative option*" (Paragraph: 018 Reference ID: 11-018-20140306). Information submitted in support of sites was considered as part of the wider site allocations process.

Sites were assessed "policy and mitigation off", i.e., the appraisal did not take into account mitigation measures proposed within other policies in the Local Plan, or, for example, any proposed site masterplans put forward by landowners, which may mitigate any identified negative effects. In the Committee's experience of undertaking SA this is normal practice to ensure that all sites are treated in the same manner. It is also worth noting the following advice contained within the PPG in relation to the level of detail required in a sustainability appraisal:

"The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan." Paragraph: 009 Reference ID: 11-009-20140306)

Part of the role of the SA is to identify the likely effects and then propose measures envisaged to prevent, reduce and as fully as possible offset likely significant negative effects. In undertaking the site selection process and formulating policy wording to accompany the preferred sites, the Committee has used the conclusions of the SA to identify where mitigation would be required to achieve sustainable development. The assessment of the original site in the SA was important as the starting point for reaching those judgements. Section 5, paragraphs 5.3.3 to 5.3.6 and Tables 5.5 and 5.6 of the Final SA Report (**STA004.1b**) demonstrate how the mitigation measures proposed in the SA have been taken into account in developing the policy requirements within the Local Plan.

Q8 – Are the conclusions in the various iterations of the SA accurate and robust? For example, what are the reasons for the different scores (and outcomes) between sites WL/WELT/008 and WL/WELT/008A?

The Local Plan for Central Lincolnshire has been subject to comprehensive SA, including Strategic Environmental Assessment (SEA), at all stages of its preparation. The SA is based on current best practice and the guidance on SA/SEA set out in the PPG. Table 2.1 in the Final SA Report (**STA004.1b**) demonstrates how the SA Report meets the specific requirements of the SEA Regulations.

At each stage in the preparation of the Local Plan, the Committee published SA documentation setting out the SA methodology and emerging findings. Each of these reports was consulted upon

at the same time as the Local Plan, providing an opportunity for respondents to comment on the SA work prepared by the Committee.

Local Plan Stage	SA Documentation
Regulation 18 - Issues and Options	Central Lincolnshire Draft SA Scoping Report, June 2019
Regulation 19 - Draft Local Plan	Central Lincolnshire Final SA Scoping Report, June 2021 Central Lincolnshire Interim SA Report and Appendices, June 2021
Regulation 19 – Proposed Submission	Central Lincolnshire Final SA Scoping Report, updated March 2022 Central Lincolnshire Final SA Report and Appendices, March 2022

The Committee is of the view that the conclusions in the various iterations of the SA are accurate and robust as they have been determined by the application of a rigorous methodology that has been applied consistently. The methodology is set out and explained in Section 4 of the Final SA Report. The Committee used a 'SA Framework' of objectives and decision-making criteria to assess the policies and sites within the Local Plan. This approach is commonly used in the SA of Local Plans.

The anticipated effect of each policy and site allocation was assessed against the SA objectives using a widely recognised scoring system ranging from a major positive effect to a major negative effect. Every effort was made to apply scores fairly, consistently and accurately. Although referred to as a scoring system, it is important to note that it does not rank the sites in any way. This is explained in more detail in paragraphs 4.3.1 and 4.3.2 and Tables 4.7 to 4.9 of STA004.1b.

The determination of likely effects against the SA objectives for site options was guided by the sites SA Framework. The SA Sites Framework (**STA004.1eii**) sets out tailored appraisal criteria for determining effects and their magnitude at a site level. It clearly sets out any limitations to the appraisal under 'Approach and Assumptions' and where professional judgement would be required alongside the SA Criteria to assign likely effects. For example, under Objective 6 Built and Historic Environment, where proximity to a heritage asset only provides an indication of potential effects.

The aim of the sites SA Framework was to provide transparency in the appraisal process, enabling a clear and consistent approach. This was subject to consultation with the statutory consultation bodies³ via the SA Scoping Report and has been refined following consultation to reflect their comments and adjusted following a pilot appraisal of a small selection of sites. Further adjustments were made to the SA Sites Framework following consultation on the Regulation 18 Draft Local Plan, to take into account comments made by representors. Appendix 8 of the Final SA Report (**STA004.1k**) sets out the comments received and how they have helped shape the SA, including the SA methodology.

The appraisal of Sites WL/WELT/008 and WL/WELT/008A is set out in Appendix 5.3 to the Final SA Report (**STA004.hiii**). The likely effects for both sites are reproduced in the table below for ease of reference. As the table demonstrates, the likely effects for both sites against the SA objectives were exactly the same.

³ Regulation 4(1) The Environmental Assessment of Plans and Programmes Regulations 2004

SA Objective	WL/WELT/008	WL/WELT/008A
	Likely effects	
1 Housing	++	++
2.1 Access to healthcare facilities	-	-
2.2 Opportunities for healthy lifestyles	++	++
4.1 Conserve and enhance biodiversity and geodiversity	0/?	0/?
4.2 Local Green Space	0	0
5. Landscape and Townscape	+/?	+/?
6. Built and Historic Environment	-/?	-/?
7. Natural Resources – Water	-/?	-/?
8.1 Air Pollution	+	+
8.2 Noise Pollution	0/?	0/?
9.1 Agricultural Land	-	-
9.2 Minerals Resource	0	0
12. Climate Change Adaptation and Flood Risk	+	+
13.1 Access to services and facilities	--	--
13.2 Sustainable travel modes	-	-
14.1 Employment	--	--
14.2 Education, training and learning	--/?	--/?
15.1 Encourage and support local economy	0	0
15.2 Protect and enhance hierarchy of centres	0	0

Appendix 7.3 to the Final SA Report (**STA004j**) sets out those sites selected as a preferred site allocation within the Local Plan and shown on the Policies Map, as well as those sites that were a reasonable alternative and therefore subject to SA but were subsequently rejected for allocation. The final column of the table provides a brief justification for selecting the preferred sites. It is important to highlight that this provides only a *brief outline* of the reasons the alternatives were not selected, as required by the SEA regulations⁴. The supporting text to the table stresses the need to cross reference with the corresponding evidence report (**EVR076-082** and supporting Appendices) which sets out more detail for each site.

For sites WL/WELT/008 and WELT/008A, arguably the text in this final column of the table in Appendix 7.3 should have been the same for both sites, as the sites are essentially the same except for a slight boundary adjustment to the north. The Committee would have no objection amending the final column of the table in Appendix 7.3 for Site WL/WELT/008A to match the justification for WL/WELT/008, should the Inspectors consider this necessary however the Committee is of the view that this is not necessary for soundness.

Q9 – Consultation was carried out by the Committee in August 2022 on a SA Addendum. What were the conclusions from this additional SA work and what implications (if any) does the evidence have on the soundness of the submitted Plan?

Following the Regulation 19 consultation on the Proposed Submission Local Plan, and in reviewing the responses received to that consultation, it came to the attention of the Committee that there were a small number of sites in small and medium villages not presented in the Final SA Report as published at the Regulation 19 stage (**STA004.1b**, **STA004.1hi-hiii**), which arguably should or could have been (a point raised by a representor).

⁴ Schedule 2 (8) The Environmental Assessment of Plans and Programmes Regulations 2004

With the agreement of the Inspectors, the Committee prepared an Addendum document to the Final SA Report (**EX005**) which contained the missing site appraisals. All these sites were assessed using the same methodology previously used for the appraisal of sites in the SA published at the Regulation 19 stage, i.e., using the SA Framework for Sites (**STA004.1eii**). As a consequence of preparing the addendum, section 7.2 and 7.3 of Appendix 7 (**EX006**) to the Final SA Report were updated, but only for those sites included in the addendum.

Following the close of the SA Addendum consultation, the Committee prepared a report of consultation (**EX018**). This document sets out the representations received to the consultation and provides a summary of the main issues raised by representors (page 24 onwards) and a response from the Committee.

In short, the Committee believes that the main issues resulting from the SA Addendum do not give rise to any implications for the soundness of the submitted plan. One respondent⁵ queried the accuracy of the figure for the remaining capacity of site NK/DIG/001 and requested the wording of Policy S81 to be amended to reflect the remaining expected capacity of the site. The Committee proposes to update the policies containing site allocations to take account of the latest monitoring as at 31 March 2022.

Issue 4 – Habitats Regulations

Q1 – When considering the potential for recreational disturbance, what is the justification for using an 8km distance to screen out likely significant effects in the Habitats Regulations Assessment Main Report ('HRA')?

The Habitats Regulations Assessment has been prepared following available guidance and best practice. Section 2.3 of the HRA Main Report (**STA05.1a**) provides an overview of the main guidance used, in the absence of formal central Government guidance.

Section 5.3 of the HRA Main Report sets out the assumptions that were applied when undertaking Stage 1 Screening of the Proposed Submission Local Plan to screen out likely significant effects in relation to recreation and visitor pressure.

As highlighted in paragraph 5.3.15, there is no national, standard method for defining a distance to screen out likely significant effects in relation to recreational disturbance. The decision to use 8km in the HRA was predominantly based on recent advice issued by Natural England when undertaking work on HRA for Local Plans in other Local Authority areas. Natural England's advice was that a number of established visitor studies across the country have shown that people will generally, and on a regular basis, travel up to 8km by car to visit countryside destinations such as National Nature Reserves. Therefore, they recommended any development within 8km of a National Site⁶ should be taken into consideration as part of the HRA. In addition, this distance was beyond the Impact Risk Zone (IRZ) for the Humber SPA which is used to identify potential impacts of proposed housing developments. HRA requires a precautionary approach at each stage of the process⁷. Taking this into account and Natural England's advice, the Committee believes that the 8km distance is justified.

⁵ Rep ID 1120745

⁶ Special Protection Areas and Special Areas of Conservation

⁷ DEFRA (2021) Habitats regulations assessments: protecting a European site

Q2 – What are the main reasons for concluding that the likelihood of impacts from residential development on functionally linked [land] will be low? Are the conclusions reasonable and robust?

Natural England has identified land potentially functionally linked to some of the European Sites within the National Site network. Work is underway to map potentially functionally linked land to the Humber Estuary SPA, however this was not available at the time of writing the HRA. A virtual meeting was held with Natural England in January 2022 to discuss the Humber Estuary and agree an approach to assessing likely impacts on functionally linked land within the Appropriate Assessment in the absence of finished mapping work. Section 7.2, paragraphs 7.2.4 to 7.2.6 of the HRA Main Report set out the methodology that was agreed with Natural England. The agreed approach was a desk-based study which analysed the characteristics of each allocation site and its suitability for SPA bird species, including habitat and current land uses.

The main reasons for concluding that the likelihood of impacts from residential development on functionally linked land would be low are set out in the last column of Table 7.2 and in the conclusion paragraphs 7.2.20 to 7.2.21 of the HRA Main Report. They include: the allocation sites were small with other suitable land closely sited; the land use was unsuitable for a number of the species; the distance from the SPA boundary was too far for some species to forage; there were sources of existing human disturbance; restricted sight lines which would not attract SPA birds; or the allocation was outside of the flood zone. In addition, the allocation sites were located outside the IRZ for the SPA. From this assessment it could be reasonably concluded that the site allocation land would not be essential for the bird species population to be sustained and would not affect the Habitat Site's integrity.

The Committee has worked closely with Natural England throughout the HRA process. The Committee consulted Natural England, as the statutory consultee for HRA, on both the Draft⁸ and Proposed Submission⁹ versions of the Local Plan. On both occasions, Natural England raised no objections and agreed with the conclusions of the HRA Report.

Therefore, the Committee is of the view that the HRA is reasonable and robust as it is based on recent advice from Natural England and an agreed methodology.

Q3 – What measures will the Local Plan put in place to ensure that likely significant effects would be avoided from relevant windfall sites, not only for residential development but other uses such as renewable energy projects?

The Appropriate Assessment for the HRA Main Report took into account mitigation measures proposed within the policies of the submitted Local Plan in reaching its conclusions.

On submission of a windfall site application, either for residential development or other uses, planning officers would apply the policies in the Local Plan which would mitigate likely significant effects.

Part one of Policy S60 Protecting Biodiversity and Geodiversity of the submitted plan provides the main measures to ensure all forms of windfall development will not result in likely significant effects.

The policy states, at bullet point a), that all development should:

“protect, manage, enhance and extend the ecological networks of habitats, species and sites of international, national and local importance”

⁸ Rep ID 1035643

⁹ Rep ID 2203604

It goes on to state that development proposals that:

“...are likely to result in a significant adverse effect, either alone or in combination with other proposals, on any internationally designated site, must satisfy the requirements of the Habitats Regulations (or any superseding similar UK legislation). Development requiring Appropriate Assessment will only be allowed where it can be determined, taking into account mitigation, that the proposal would not result in significant adverse effects on the site’s integrity.”

Specifically for renewable energy projects, Policy S14 states:

“In areas that have been designated for their national importance, as identified in the National Planning Policy Framework, renewable energy infrastructure will only be permitted where it can be demonstrated that it would be appropriate in scale, located in areas that do not contribute positively to the objectives of the designation, is sympathetically designed and includes any necessary mitigation measures.”

The HRA concludes, at paragraph 7.3.10, that:

“The safeguards set out in Policy S14 Renewable Energy, together with Policy S60 Biodiversity and Geodiversity which sets out a requirement for HRA, provides sufficient assurance that the Local Plan will not result in a likely significant effect on the Humber Estuary SAC/SPA.”

The HRA Main report concluded that, overall, the policies and site allocations within the submitted Local Plan would not result in likely significant effects on European sites. The Committee was pleased to receive confirmation from Natural England¹⁰ that:

“...we agree with the HRA report’s conclusions that the Central Lincolnshire Local Plan would not be likely to have a significant effect on a European Site either alone or in combination with other plans or projects, and no further assessment work is required.”

Issue 5 – Strategic Flood Risk Assessment

Q1 – Paragraph 3.4 of the Level 1 Strategic Flood Risk Assessment (‘SFRA’) states that the EA flood zones do not currently include an allowance for climate change. However, “...recent discussions with the EA has concluded that the impact of climate change on the extent of the Flood Zones in this area is likely to be negligible and should not significantly impact on the strategic allocation of land.” What are the reasons for this, and, how have the implications of climate change been taken into account in the allocation of land?

A Level 1 Strategic Flood Risk Assessment was undertaken which was used to inform the initial consideration of proposed allocations (**FRI001**). A Level 2 Strategic Flood Risk Assessment was then undertaken for those proposed allocations, without planning permission, that had any portion of the site in either Flood Zone 3 or 2, as identified on the current EA Flood Map (**FRI002**). The EA were consulted throughout the site allocation process.

Through further discussions with the EA when undertaking the SFRA Level 1 and Level 2, they advised that:

The risk of flooding from Main Rivers in most of Central Lincolnshire is reduced by the presence of raised defences and washlands. The modelling that has been undertaken on

¹⁰ Rep ID 1103604

those rivers, with the defences in place, shows that the 20% increase in river flows has little impact on flood levels within the channel.

The modelling of the flood zones ignores those defences and lets the flood water flow into large areas of well-defined floodplain. A 20% increase in the 1:100 flow would result in flows somewhere between the present day 1:100 and 1:1000 flood extents, therefore present day flood zone 2 could be a surrogate for a climate change flood zone 3. Given the topography of central Lincolnshire the small increase in the level associated with a 1:1000+20% flow would result in a marginal increase in flood extent, i.e. climate change flood zone 2.

Therefore, for the strategic allocation of land it was agreed with the EA that additional hydraulic modelling for the impact of climate change on Flood Zones was not considered necessary.

Q2 – Is the Plan consistent with paragraph 161 of the Framework which states that all plans should apply a sequential, risk-based approach to the location of development - taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.

Yes, the Regulation 19 Site Allocations Sequential Test (**HOU006**) sets out how the sequential, risk-based approach to the location of development has been applied to site allocations, consistent with national policy and guidance.

Site allocations were informed by the Level 1 SFRA (**FRI001**), Level 2 SFRA (**FRI002**) and input from the EA. Where further detailed assessment would be required as part of any future planning application, this has been highlighted in the site-specific requirements for the relevant site allocation policy.

Q3 – What is the justification for allocating land for development where sites fall (even in part) within Flood Zones 2 or 3? In answering this question, it would assist the examination if the Committee could produce a table identifying each relevant site, the land use proposed and the total area at risk of flooding.

The process for allocating housing sites is detailed in the Housing Allocations Evidence Report (**EVR076-082** or **HOU002a** – for the avoidance of doubt, these are the same documents, but replicated for people wanting to find the documentation). The scoring in relation to fluvial flood risk and surface water flooding is set out in Table 1, replicated below for ease of reference:

Table 1: GIS Desktop Based Constraint Check

Criteria	Source	Red	Amber	Green
Flood Risk	Environment Agency	Area of site within Flood Zone 3 exceeds the remaining undevelopable area of the site as set out in Table 2	Area of the site in Flood Zone 2 exceeds the remaining undevelopable area of the site as set out in Table 2	Site within flood zone 1
Surface water flooding	Environment Agency	Area of the site at high risk of surface water flooding exceeds the remaining undevelopable area of the site as set out in Table 2	Area of the site at medium risk of surface water flooding exceeds the remaining undevelopable area of the site as set out in Table 2	Site at low or very low risk of surface water flooding

Paragraph 3.7 clarifies that sites within flood zone 3 were not included as allocations and were sieved out at the earliest stage of the process. Sites that were partially at risk of flooding or contained areas at risk of surface water flooding were carried forward to a more detailed assessment of opportunities and constraints to consider sites in a more qualitative way. The Level 1 Strategic Flood Risk Assessment (SFRA) (**FRI001**) looked at flood risk on the sites that had been put forward for consideration as an allocation and mapped these sites against the risk of flooding.

This qualitative assessment looked at a wide variety of known constraints and included consultation with various bodies, which included the Environment Agency, as is detailed in paragraph 4.4 of the evidence report. Part of this included the consideration of flood risk from all sources on the sites. The amount of site at risk of flooding and the specific location on the site of this risk was considered to see whether a development on the site could realistically take place whilst avoiding the areas of flood risk – where they could they were not discounted.

The Level 2 SFRA (**FRI002**) then looked at the sites being proposed for allocation that included more than just very minimal areas of flood risk from either fluvial or pluvial sources and looked in detail at the remaining risk and the potential to deliver safe development on these sites by looking at flood avoidance, resistance or resilience measures as is detailed in paragraph 3.10.

Importantly, the sites reviewed in the Level 2 SFRA did not include sites with permission as these will have been supported by individual Flood Risk Assessments at application stage and deemed appropriate and safe to be developed in issuing the permission.

All sites allocated within the Local Plan can be made safe and are otherwise suitable in flood risk terms, potentially with mitigation measures as detailed in the Level 2 SFRA or as detailed in the flood risk assessments supporting planning applications. It is also worth noting that flooding measures as part of applications can significantly improve flood risk on a site, so there are occasions where developing a site which is partly at risk of flooding is beneficial.

The below table sets out the allocations with areas of flood risk from surface water and rivers using the RAG scoring set out above, the land use proposed and the area at risk of flooding as requested. For clarity, the data has been split into two sections:

1. Allocated sites which do not have permission; and
2. Allocated sites with permission.

The reason for separating these sites is to provide clarity about which sites have been included as a result of their permission and that have been approved following detailed consideration of flood risk on the site.

Sites without Permission with some Risk from Flooding						
Ref ¹¹	Site address	Proposed land use	Surface water RAG	Flood risk RAG	Area at risk of flooding	Area not at risk of flooding
COL/ABB/002*	Former Main Hospital Complex, St Anne's Road, Lincoln	Residential	A	G	0.03ha	0.95ha
COL/MIN/001*	Roman Gate 2, Land off Flavian Road, Lincoln	Residential	A	G	0.47ha	1.7ha
COL/MIN/005	Land at Cathedral Quarry, Riseholme Road, Lincoln	Residential	A	G	0.06ha	2.68ha
COL/MIN/006*	Land west of Nettleham Road, Lincoln	Residential	A	G	0.06ha	1.11ha
NK/BIL/003*	Billinghay Field, Mill Lane, Billinghay	Residential	A	G	0.01ha	6.85ha
NK/BIL/004*	Land to the south of the Whyche, Billinghay	Residential	A	G	0.42ha	3.93ha

¹¹ Note: Site references followed by an * are allocated in the adopted Local Plan.

NK/CAN/003 ^{12*}	South East Quadrant, Canwick Heath	Mixed Use	A	G	3.57ha	461.42ha
NK/GHAL/002 ¹³	Land at Hall Farm, Great Hale	Residential	A	A	0.20ha	0.90ha
NK/HEC/004	Land off Sleaford Road, Heckington	Residential	A	G	0.01ha	2.04ha
NK/KIRK/004*	Former Hoplands Depot, Boston Road, Sleaford	Residential	A	A	0.02ha	1.81ha
NK/LEAD/001	Station Yard, Leadenham, Cliff Road, Leadenham	Residential	A	G	0.09ha	0.99ha
NK/LEAS/001	Land off Meadow Lane, Leasingham	Residential	A	A	1.09ha	0.92ha
NK/NHYK/001*	South West Quadrant, Land at Grange Farm, Lincoln	Mixed Use	A	A	12.77ha	120.75ha
NK/SLEA/015*	Sleaford West Quadrant SUE	Mixed Use	G	A	21.05ha	56.90ha
NK/WAD/004A	Land south of Station Road, Waddington Lowfields	Residential	A	G	0.34ha	10.36ha
WL/BARD/012A	Land to the north of Abbey Road and Wragby Road, Bardney	Residential	A	G	0.05ha	2.83ha
WL/BLYT/006	Land to south of Rowan Drive, Blyton	Residential	A	G	0.01ha	4.14ha
WL/CAI/001*	Land to the South of North Kelsey Road, Caistor	Residential	A	G	0.19ha	5.71ha
WL/CAI/002*	Land at Sunnyside, west of Tennyson Close, Caistor	Residential	A	G	0.07ha	2.60ha
WL/COR/002A	Land north of High Street, Corringham	Residential	A	G	0.27ha	1.51ha
WL/CW/001*	Land North of Rudgard Avenue, Cherry Willingham	Residential	A	G	0.17ha	5.00ha
WL/CW/002*	Land East of Rudgard Avenue, Cherry Willingham	Residential	A	G	0.02ha	5.91ha
WL/CW/003*	Land East of Thornton Way, Cherry Willingham	Residential	A	G	0.02ha	8.84ha
WL/FISK/001A	Land North of Corn Close, Fiskerton	Residential	A	G	0.02ha	8.11ha
WL/GAIN/020*	AMP Rose site, Heapham Road, Gainsborough	Residential	A	G	0.01ha	1.14ha
WL/HEMC/006	Land north of A631 and east of Minden Place, Hemswell Cliff	Residential	A	G	0.45ha	6.42ha

¹² Note: Part of this site has permission.

¹³ Note: Part of this site has permission.

WL/KEE/003*	Land at Church Lane, Keelby	Residential	A	G	0.05ha	4.40ha
WL/MARK/001	Land adjacent to Davens Court, Legsby Road, Market Rasen	Residential	A	G	0.11ha	1.73ha
WL/MARK/003*	Land to the east of Gordon Field & south of Chapel Street, adjoining Market Rasen Railway Station	Residential	A	G	0.19ha	1.20ha
WL/MIDR/016*	Land north of Gallamore Lane, Market Rasen	Residential	G	A	0.79ha	2.67ha
WL/NHAM/010	Land off Larch Avenue (rear of 67 Sudbrooke Lane), Nettleham	Residential	A	G	0.01ha	2.43ha
WL/NHAM/011	East of Brookfield Avenue, Nettleham, Lincoln	Residential	A	A	0.98ha	2.06ha
WL/SAXI/004	Land off Sykes Lane, Saxilby, Lincoln	Residential	A	G	0.39ha	6.78ha
WL/SAXI/007	Land west of Rutherglen Park, Saxilby	Residential	A	G	0.01ha	0.81ha
WL/SC/003	Land to the southwest of Main Street, Scothern	Residential	A	A	0.08ha	3.45ha
WL/SC/004A	Land off Juniper Drive, Scothern	Residential	A	G	0.12ha	2.60ha
WL/STUR/003	Land at High Street, south of School Lane, Sturton by Stow	Residential	A	G	0.12ha	1.64ha
WL/WELT/001A	Prebend Lane, Welton, Lincoln	Residential	A	G	0.29ha	10.09ha

Sites with Planning Permission with Some Risk from Flooding						
Ref ¹⁴	Site address	Proposed land use	Surface water RAG	Flood risk RAG	Area at risk of flooding	Area not at risk of flooding
COL/BOU/001*	Western Growth Corridor, Lincoln	Mixed Use	A	R	325.72ha	64.98ha
COL/BOU/003	Former Victory Public House, Boultham Park Road, Lincoln	Residential	G	R	0.27ha	0ha
COL/CAR/004	Church at Long Leys Road, Lincoln	Residential	A	G	0.02ha	0.44ha
COL/CAR/005	128-130 Carholme Road, Lincoln	Residential	A	A	0.01ha	0.07ha

¹⁴ Note: Site references followed by an * are allocated in the adopted Local Plan.

COL/CAS/001*	Land north of Ermine West (Queen Elizabeth Road), Lincoln	Residential	A	G	0.04ha	13.5ha
COL/MIN/003*	Romangate Development, land at Nettleham Road, Lincoln	Residential	A	G	1.22ha	5.14ha
COL/MOOR/001*	Land north of Hainton Road, Lincoln	Residential	A	G	0.18ha	0.96ha
NK/AUB/001A	Land south of Thorpe Lane, South Hykeham	Residential	A	G	0.12ha	5.08ha
NK/BBH/003*	Land South of Bracebridge Heath	Residential	A	G	0.34ha	12.86ha
NK/BIL/007*	Land off Waterside, rear of 27 High Street, Billinghay	Residential	A	G	0.07ha	1.98ha
NK/BIL/012*	Land off West Street, Billinghay	Residential	A	G	0.06ha	4.50ha
NK/BRAN/012*	Land To West Of Station Road Branston	Residential	A	G	0.04ha	4.52ha
NK/LEAD/002	Land off Main Road, Leadenham	Residential	R	G	0.45ha	0.63ha
NK/LEAS/006	Land north of Moor Lane, Leasingham	Residential	G	A	0.14ha	5.08ha
NK/OSB/008	Land south of The Drove, Osbournby, Sleaford	Residential	A	G	0.04ha	0.65ha
NK/POT/007	Land at Station Road and Cross Street, Potterhanworth	Residential	A	G	0.06ha	1.24ha
NK/RUSK/018*	Land north of Whitehouse Road, Ruskington	Residential	A	G	0.25ha	2.98ha
NK/SKEL/001*	Land south of Woodbank, Skellingthorpe	Residential	A	G	0.38ha	3.85ha
NK/SKEL/007*	Land east of Lincoln Road, Skellingthorpe	Residential	A	A	2.17ha	8.35ha
NK/SKEL/015*	Manor Farm, Church Road, Skellingthorpe	Residential	G	A	1.22ha	0.28ha
NK/SKEL/016*	Land south of Ferry Lane, Skellingthorpe	Residential	A	A	4.13ha	0.52ha
NK/SLEA/002*	Land to the East of CL1013, Poplar Farm, South of A17, Sleaford (Part A) and Furlong Way, Sleaford	Residential	A	R	9.23ha	29.68ha
NK/SLEA/014*	Sleaford south SUE	Mixed Use	A	G	1.75ha	58.07ha

NK/SLEA/016*	Land west of London Road, Sleaford	Residential	A	G	0.34ha	6.52ha
NK/SLEA/017*	Land at Grantham Road, Sleaford	Residential	A	G	0.18ha	14.56ha
NK/SWI/006	Land south of Moor Lane, Swinderby	Residential	R	g	1.62ha	6.58ha
NK/WELB/006	Land at Borfa-Wen Farm, Hall Orchard Lane, Welbourn	Residential	A	G	0.068ha	0.43ha
NK/WSH/002*	Land to the north of Witham St Hughs (Phase 3)	Mixed Use	A	G	4.24ha	64.87ha
WL/BARD/020*	Land at Field Lane, east of Wragby Road, Bardney	Residential	A	A	0.81ha	2.6ha
WL/BARD/021*	Land west of Hancock Drive, Bardney	Residential	A	G	0.10ha	4.70ha
WL/BARL/002	Land at Barlings Lane, Langworth	Residential	A	G	0.04ha	2.29ha
WL/BUR/005	Land north of Leisure Centre, Burton Waters, Lincolnshire	Residential	A	R	4.43ha	0ha
WL/CW/009	Land at Eastfield Rise Farm, Fiskerton Road, Cherry Willingham	Residential	A	R	25.05ha	4.20ha
WL/DUNH/011*	Land north of Honeyholes Lane, Dunholme	Residential	A	G	0.02ha	3.71ha
WL/DUNH/012*	Land to the south of Honeyholes Lane, Dunholme	Residential	A	G	0.01ha	8.54ha
WL/GAIN/001*	Gainsborough Northern Neighbourhood SUE	Mixed Use	A	G	5.34ha	123.34ha
WL/GAIN/005*	Riverside North Housing Zone, Gainsborough	Residential	A	R	4.29ha	0ha
WL/GAIN/008	Land west of Horsley Road, Gainsborough	Residential	A	R	2.03ha	0ha
WL/GAIN/013*	Former Middlefield School, Middlefield Road, Gainsborough	Residential	A	G	0.17ha	7.24ha
WL/GAIN/015*	Gainsborough Southern Neighbourhood SUE (Land at Foxby Lane, Gainsborough)	Mixed Use	A	A	6.59ha	133.86ha
WL/GAIN/019*	Gainsborough Riverside Gateway	Residential	A	R	3.76ha	0.28ha

WL/GAIN/022	Former Ropery Inn, 202 Ropery Road, Gainsborough	Residential	G	R	0.11ha	0ha
WL/GAIN/023	The Maltings, 2B Lea Road, Gainsborough	Residential	G	R	0.15ha	0.01ha
WL/GAIN/024	Land to the rear of 227 - 257 Lea Road, Gainsborough	Residential	A	G	0.04ha	0.48ha
WL/GAIN/025	Land at The Beckett School, Whites Wood Lane, Gainsborough	Residential	A	G	0.09ha	0.55ha
WL/GLH/009	The Willows Garden Centre (north), Gainsborough Road, Glentham	Residential	A	A	0.52ha	0.82ha
WL/KEE/001	Land south of Stallingborough Road, Keelby	Residential	A	G	0.43ha	3.40ha
WL/LEA/003*	Land south of Willingham Road, Lea, Gainsborough	Residential	A	G	0.07ha	2.97ha
WL/MAR/016	Land off Stow Park Road, Marton	Residential	G	A	0.03ha	4.34ha
WL/MARK/002*	Land off Linwood Road & The Ridings, Market Rasen	Residential	A	G	0.16ha	5.75ha
WL/MARK/010*	Land between properties known as Mayfield and Wodelyn Cottage, Linwood Road, Market Rasen	Residential	A	G	0.38ha	1.44ha
WL/MIDR/018*	Land east of Caistor Road, Market Rasen	Residential	G	A	3.89ha	12.78ha
WL/NHAM/001*	Land West of Nettleham Road, Lincoln Fringe (Romangate)	Residential	A	G	0.14ha	3.64ha
WL/SAXI/013*	Land off Church Lane, Saxilby	Residential	A	A	0.15ha	9.94ha
WL/SCO/012*	Land east of North Moor Road, Scotter	Residential	A	G	0.06ha	1.62ha
WL/STUR/007	Land adj Obam Lift Services Ltd, Tillbridge Lane, Sturton by Stow, Lincolnshire	Residential	A	G	0.07ha	0.63ha
WL/SUD/002	Sudbrooke Farm, Sudbrooke	Residential	R	R	8.88ha	12.05ha
WL/WELT/011*	Land east of Prebend Lane, Welton	Residential	A	G	0.42ha	27.93ha
E1	Teal Park, North Hykeham	Employment	A	G	0.39ha	34.2ha

E2	Lincoln Science and Innovation Park (LSIP), Lincoln	Employment	A	R	25.05ha	0ha
E3	St Modwen Park, Witham St Hughs	Employment	A	G	2.02ha	24.94ha
E4	Somerby Park, Gainsborough	Employment	A	G	1.83ha	9.81ha
E5	Sleaford Enterprise Park	Employment	A	A	3.91ha	10.76ha

Issue 6 – Public Sector Equality Duty ('PSED')

Q1 – In what way does the plan seek to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

Both the Consultation Draft Local Plan consulted on at the Regulation 18 Stage, and the Proposed Submission Local Plan consulted on at Regulation 19 Stage have been subject to Equality Impact Assessments (**STA009** and **STA009.1**) to assess their potential impacts and ensure that the plan has due regard to the Equality Act 2010. The plan is expected to have a neutral effect on the majority of the equality groups. For the three groups where there is a potential impact identified, this is a positive impact. Those groups are: Particular Age Groups; People with Disabilities; and Race. The plan actively makes provision for these protected characteristics.